

From: Brian Vance
To: John Carlson
Date: Fri, May 7, 1999 1:44 PM
Subject: DOE inspection, 5/7/99

John, I accompanied Bob Stone and two others from DOE on an inspection tour of the facility today. They showed up to inspect and would not reschedule for next week with you. These are the items that were noted as being deficient or needing attention.

Questioned whether paint booth filters should be designated haz waste due to possible presence of metals. Indeed the Mariners stadium paint contains lead and cadmium. Some testing would be appropriate. Need protocol as to when to test and what test to do.

Some misc. drums around Shop yard and at shed 6 do not have labels. Need to be ID'd by some sort of label.

Shed 6 waste solvent collection is a 5 gallon can, w/open funnel. Needs Haz Waste label, risk label, and closed container. (Shed 6 was in otherwise neat, orderly condition.)

Shop Satalite Accumulation area:

Has over max of 55 gallons of MEK waste stream. (1 ½ drums present for waste mek.) Waste paint drum has no label. The top of the drum was partially open. (askew) Filled drum of waste mek had no accumulation start date filled in yet. One damaged drum present, hole in side, top askew, contains haz waste. A drum labeled waste pending analysis was not in the containment area. (Was dated though which was good). Misc. 5 gallon and 1-2 gallon buckets present without lids, containing some wastes, (not legally empty.)

Housekeeping needs attention throughout. Misc. garbage, pallets, obstacles, discarded aerosol paint cans.

CP Equip. Main Accumulation Area:

1) Drum labeling. Haz Waste labels did not have accumulation start dates marked. Drums that are not haz waste are not clearly separated from haz waste storage. Need 30" rule enforced, labels need to face out for easy visibility. Waste Pending labels, no dates marked, drums have both non-haz and waste pending labels, confusing.

2) Some of the drums were not closed in that the fill tops had too much accumulated paint globs to close completely. Some drums had no small bung installed. One drum outside in rain w/ top off, has flammable paint residue and water mixed inside. Some drums around area w/unknown contents. etc

3) Drums in river yard, filled w/diesel, not relabeled correctly, confusing.

4) General Housekeeping not good

5) Returned products from field spread around area, not organized, not labeled haz waste, some not in closed containers.

6) Are weekly inspections done? Where are the records sent, stored?

7) Do we have written training plan, who is the 40hr trained operator?

Bob Stone will contact you early next week to talk about his visit today. He wants to inspect your records, manifests, logs, weekly inspection records, training records for haz waste operators etc. I did not know

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where these were (or what state of readiness they were in) so I asked him to contact you to see these items. Bob Stone would like us to have these records available at all times regardless of whether or not you or Uschi are in the office. I will see you about that so I know what to show in the future.

Symantha and I and Karl will make our area ready for reinspection by Tues. the 11th. I will inform the shop of their problems so that they can make plans to rectify their problems also.

Brian

CC: Mike Cassidy